EXHIBIT B

EXHIBIT B¹ – DEFENDANTS' PROPOSED SCHEDULE

Date

Complete. E.D. Tex. deadline

was August 10, 2012

Complete. E.D. Tex. deadline

was January 10, 2013

Complete. E.D. Tex. deadline

was February 1, 2013

Complete. E.D. Tex. deadline

was March 11, 2013

July 9, 2013

July 16, 2013

August 30, 2013

September 13, 2013

September 20, 2013

October 11, 2013

October 18, 2013

November 7, 2013 or such other date amenable to the

Court's calendar

November 8, 2013 or such other date amenable to the

Court's calendar

May 2, 2014

June 13, 2014

June 27, 2014

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Event

Plaintiff's Infringement Contentions and Document

Defendants' Invalidity Contentions and Document

Local Patent Rule ("L.P.R.") 3-1 and 3-2)

(E.D. Tex. L.P.R. 3-3 and 3-4)

Joint Case Management Statement

Close of claim construction discovery

Responsive claim construction briefs

Reply claim construction briefs

Claim Construction Hearing

Fact Discovery Cutoff

(non-construction issues)

Expert witness reports due

Markman Tutorial

Case Management Conference

N.D. Cal. Patent L.R. 4-3)

(E.D. Tex. L.P.R. 4-1)

Production Accompanying Disclosure Due (E.D. Tex.

Production Accompanying Invalidity Contentions Due

Parties Exchange Preliminary Claim Constructions &

Joint Claim Construction and Prehearing Statement (per

Opening claim construction briefs by party asserting

Produce Extrinsic Evidence (E.D. Tex. L.P.R. 4-2)

Parties Exchange Proposed Terms for Claim Construction

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patents

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27 28 Parties with burden of proof designate expert witnesses

¹ Defendants' proposed schedule incorporates past E.D. Tex. deadlines.

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Parties designate rebuttal expert witnesses (non-construction issues)	July 18, 2014
Rebuttal expert witness reports due	August 1, 2014
Close of Expert Discovery	August 29, 2014
Deadline to File Dispositive Motions	September 12, 2014
Opposition briefs on dispositive motions	October 10, 2014
Reply briefs on dispositive motions	October 24, 2014
Hearing of Dispositive Motions	November 21, 2014, or such other date amenable to the Court's calendar
Pretrial Conference	February 2, 2015, or such other date amenable to the Court's calendar
Initial Trial	February 9, 2015, or such other date amenable to the Court's calendar